

# **EXHIBIT L**

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et )  
al., )  
 ) Case No.  
Plaintiffs, ) 4:20-cv-00957-SDJ  
 )  
vs. ) Hon. Sean D. Jordan  
 )  
GOOGLE LLC, )  
 )  
Defendant. )

FRIDAY, APRIL 26, 2024

HIGHLY CONFIDENTIAL - PURSUANT TO PROTECTIVE  
ORDER

- - -

Remote videotaped deposition of  
Google LLC 30(b)(6) designee [REDACTED] and  
in his 30(b)(1) capacity, held at the  
location of the witness in Niwot, Colorado,  
commencing at 9:01 a.m. Mountain Time, on the  
above date, before Carrie A. Campbell,  
Registered Diplomat Reporter, Certified  
Realtime Reporter, Illinois, California &  
Texas Certified Shorthand Reporter, Missouri,  
Kansas, Louisiana & New Jersey Certified  
Court Reporter.

- - -

Job No. MDLG6661075

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11 Precision Trial Solutions

12  
13 V I D E O G R A P H E R :

ZACH HONE,

14 Golkow Litigation Services

15 - - -

Page 4

INDEX

PAGE

APPEARANCES..... 2

EXAMINATIONS

BY MR. ROBINSON..... 8

EXHIBITS

No. Description Page

Exh 182 [REDACTED] LinkedIn résumé 26

Exh 183 E-mail(s), 40

GOOG-DOJ-AT-00373503 -

GOOG-DOJ-AT-00373539

Exh 184 Potential Reviewers, 63

GOOG-DOJ-13204134 -

GOOG-DOJ-13204147

Exh 185 [REDACTED] 79

GOOG-AT-MDL-015807149 -

GOOG-AT-MDL-015807171

Exh 186 PRD - Real-time yield management 97

for Web, Google confidential and  
privileged,

GOOG-DOJ-13202296 -

GOOG-DOJ-13202302

Exh 187 Enhanced Dynamic Revenue Sharing, 109

Status: Draft, As of: August 19,  
2014,

GOOG-NE-13232022 -

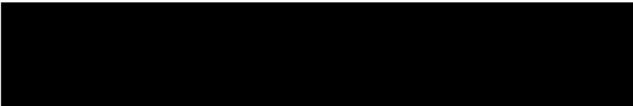
GOOG-NE-13232031

Exh 188 Proposal to change AdX, GDN, DBM 149

Pricing Strategy,

GOOG-AT-MDL-B-005112788 -

GOOG-AT-MDL-B-005112791

		Page 5
1	Exh 189 	194
2	GOOG-DOJ-13206499 -	
3	GOOG-DOJ-13206501	
4	Exh 190 Significant DRS projects for	198
5	NextGen awareness,	
6	GOOG-DOJ-13203553 -	
7	GOOG-DOJ-13203557	
8	Exh 191 E-mail(s),	211
9	GOOG-TEX-00103040 -	
10	GOOG-TEX-00103043	
11	Exh 192 E-mail(s),	221
12	GOOG-DOJ-14743554 -	
13	GOOG-DOJ-14743563	
14	Exh 193 E-mail(s),	241
15	GOOG-TEX-00104475 -	
16	GOOG-TEX-00104483	
17	Exh 194 E-mail(s),	265
18	GOOG-DOJ-15421837 -	
19	GOOG-DOJ-15421841	
20	Exh 195 Printout of conversation dated	275
21	2017-11-29,	
22	GOOG-NE-13231717 -	
23	GOOG-NE-13231720	
24	Exh 196 E-mail(s),	300
25	GOOG-AT-MDL-012331946 -	
	GOOG-AT-MDL-012331948;	
	GOOG-AT-MDL-017664768 -	
	GOOG-AT-MDL-017664773;	
	GOOG-TEX-00082760-	
	GOOG-TEX-00082771	
	Exh 197 E-mail(s),	319
	GOOG-DOJ-13892867 -	
	GOOG-DOJ-13892872	
	Exh 198 Google Chat printout,	336
	GOOG-AT-MDL-008240403	
	Exh 199 E-mail(s),	364
	GOOG-DOJ-14398632 -	
	GOOG-DOJ-14398642	

Page 6

1 Exh 200 E-mail(s), 372

GOOG-AT-MDL-012513796 -

2 GOOG-AT-MDL-012513798

3 Exh 201 E-mail(s), 381

GOOG-NE-07797482 -

4 GOOG-NE-07797483

5 Exh 202 E-mail(s), 385

GOOG-AT-MDL-007027113 -

6 GOOG-AT-MDL-007027115

7 (Exhibits attached to the deposition.)

8

9 CERTIFICATE.....393

10 ACKNOWLEDGMENT OF DEPONENT.....395

11 ERRATA.....396

12 LAWYER'S NOTES.....397

13

14

15

16

17

18

19

20

21

22

23

24

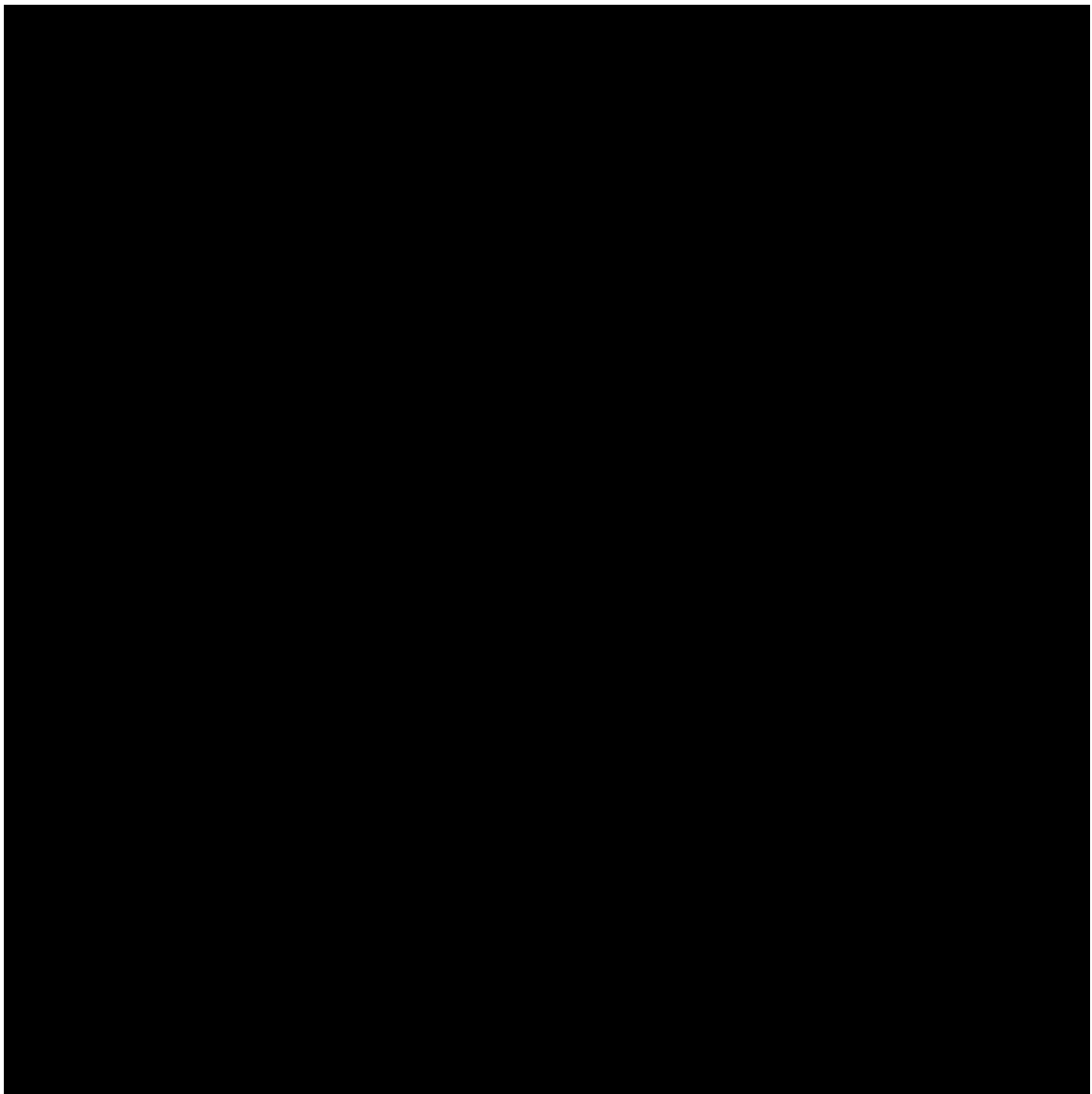
25

1 on the network, I might have instant messaged  
2 a colleague about meeting someplace, but for  
3 work, I use Google Chat.

4 Q. And are you aware that Google  
5 Chats have an ability to choose whether or  
6 not you want the chat history to be on or  
7 off?

8 A. Yes.

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MR. JUSTUS: Objection. Form.

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20 QUESTIONS BY MR. ROBINSON:

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MR. JUSTUS: Objection. Form.

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QUESTIONS BY MR. ROBINSON:

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Q. Why would someone in a chat  
with you want to turn the history off?

MR. JUSTUS: Objection. Form.

THE WITNESS: If they were --  
if they were wanting to talk about a  
performance thing or gossip or  
something like that.

QUESTIONS BY MR. ROBINSON:

Q. And so then there wouldn't be a  
written record of whatever they're saying.

Right?

A. I don't know -- I mean, that's  
why I assume they want to do it. I don't  
know.

CERTIFICATE

I, CARRIE A. CAMPBELL, Registered Diplomat Reporter, Certified Realtime Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination, [REDACTED] was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



CARRIE A. CAMPBELL,  
NCRA Registered Diplomat Reporter  
Certified Realtime Reporter  
California Certified Shorthand  
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Louisiana Certified Court Reporter  
#2021012  
Notary Public  
Dated: April 29, 2024